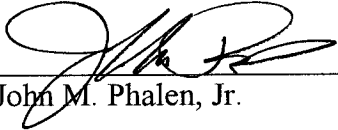


**ATTORNEYS FOR DEFENDANT
NICHOLAS BREDIMUS**

CERTIFICATE OF SERVICE

I certify that a true and correct copy of Appendix to Defendant's Response to Plaintiffs' Motion to Relieve Plaintiff from Court's Judgment Dated November 29, 2004 was served upon Raul H. Loya, Loya & Associates, Park Place on Turtle Creek, 2911 Turtle Creed Blvd., Suite 907, Dallas, Texas 75219 via Certified Mail Return Receipt Requested, on June 24, 2005.



John M. Phalen, Jr.

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EXHIBIT

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| 1. | Bank of Thailand, <i>Regional Economies</i> , available at http://www.bot.or.th/bothomepage/databank/RegionEcon/northern/public/econ_e/ch7e/EcStructure_e.htm (last visited June 22, 2005). | 1 |
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Economic Structure

Service Manager : ☒ Somsak (0-5393-1155) / Rawisrapa (0-5393-1156)

Economic Structure of the Northern Region

Overview

The northern region consists of 17 provinces and stretches over one-third or 106 million Rai (169,600 square kilometer) of the country. As forested mountains dominate most of the topography, agricultural area holds only 29.2 million Rai or one-fifth of the country's agricultural area. As at the end of 2002, northern population reached one-fourth of the country, totaling 11.2 million. Provinces with a population of over one million were Chiang Mai, Chiang Rai and Nakhon Sawan. In 2002, average annual per capita income was Baht 43,987, which placed the northern region ahead of the northeastern region, but below other regions and the nation (Baht 85,951)

Economic Structure

In recent years, the northern region has grown and diversified, but agriculture remains a mainstay. The region's economy, in terms of Gross Regional Product (GRP), average grew at 0.7 percent during 1997-2002, compared with Thailand's average economic growth of 0.8 percent a year during the same period. Agricultural was the most important sector, registering 20.1 percent of 2002's GRP, followed by manufacturing, wholesales and retail trade and transport and communications at 17.9, 17.3, and 7.0 percent respectively. Principal crops in this region are rice, sugarcane, maize, tobacco, soybeans, vegetables, and fruits. For manufacturing, leading industries include manufactures of electronic components, sugar, cement, ceramic product; processing of fruits and vegetables; and handicrafts.

Contribution to Thai Economy

Based on economic activity, the northern region contributed about 9.1 percent or Baht 495,904 million to 2002's Gross Domestic Product (GDP at current market prices). Agricultural and mining sectors, in particular, have played key role on the national scale, capturing as much as 23.5 percent of total agricultural and 15.0 percent of total mining in 2002. As a main crops producer, the northern region supplies over one-fourth of the country's crops production. Recent list of major crops includes rice, maize, and sugar cane. Particular produce produced exclusively by the north, including logan, lychee, garlic, tobacco leaves, shallots, and onions, even captures the lion's share of the country's respective produce. Endowed with minerals resources, the north is an important mineral-producing region of the country. Lignite, limestone, and kaolin are prime asset of Lampang; zinc ore is resource of Tak; and crude oil is property of Kam Pheang Phet. Besides minerals, water is another vital resource nurturing not only agriculture within the region but also the southward central region, and Bangkok and vicinities.

Geographic and Economic Structure

The northern region can be divided into two parts: the upper north and the lower north.

The upper north, bordering on Myanmar and Lao PDR, covers about 60 percent of the northern region and consists of nine provinces: Chiang Mai, Chiang Rai, Mae Hong Son, Lamphun, Phayao, Nan, Phrae, Lampang, and Tak. As forested mountains dominate most of the area, land suitable for agriculture is below 15 percent. On the other hand, this remarkable mountainous terrain and magnificent scenery is quality that has drawn tourists and new residents to the upper north for decades. As a result, services industry, particularly hotels, resorts, and souvenir trade, becomes a major force driving the economy of the upper north. Apart from services, the upper north also involves in power generation. At present, prominent electricity producers are Bhumibol Hydro Power Plant in Tak and Mae Moh Power Plant in Lampang. For manufacturing, the upper north's rich minerals resource such as kaolin, zinc ore, limestone, coal, and lignite has contributed considerably to development of leading industries including manufactures of ceramic products, zinc and zinc products, and cement. In the area of foreign trade, the upper north is known as a gateway to conduct cross-border trading with Myanmar, Lao

PDR, and southern China.

In terms of economic activity, Chiang Mai is deemed as the upper north and the region's economic center. The province contributed to about 16.0 percent of the 2002's GRP and was ranked the third of the country in terms of bank branches. As at the end of 2002, Chiang Mai's credits and deposits amounted to about one-third of credit outstanding and deposit outstanding of the northern region.

The lower north, lying next to the central region, consists of eight provinces: Kam Phaeng Phet, Phichit, Sukhothai, Uttaradit, Nakhon Sawan, Phetchabun, and Uthai Thani. As most of the area is fertile plateau suitable for cultivation, agriculture becomes the backbone of the lower north with major crops concentrates in rice, maize, and sugar. At present, the lower north is recognized as a main center for producing and trading of rice and crops. Influenced by productive agriculture, most local manufacturing involves in agro businesses such as manufacture of sugar in Nakhon Sawan, Kam Phaeng Phet, Uttaradit, and Phitsanulok; manufacture of agricultural machinery in Phitsanulok and Nakhon Sawan; rice mill in Phichit, Phitsanulok, and Nakhon Sawan. Besides agriculture and manufacturing, tourism is another thriving industry. In recent years, splendid historic site of Sukhothai has gained international reputation and become one of Thailand's most visited ancient sites.

Labor Condition

As at the end of 2003, labor force amounted to 6.6 million; of this 60 percent were agricultural workforce. Minimum daily wage in each province range between Baht 130-137 except Chiang Mai's, which was Baht 145 (Ministry of Labor, December 8, 2003). Labor movement is an interesting issue as seen by migration of labors to the central region and foreign countries including Taiwan, Singapore, Brunei, and Israel. The migration, however, has been substituted by immigration of labors from the northeastern region and neighboring countries, particularly in the area of sugar cane harvesting.

Financial Sector

There were 487 bank branches operated in the northern region at the end of June 2004. With 12.8 percent of total bank branches in Thailand, the region came in second place after Bangkok and vicinities. Majority of bank branches (about 60 percent) were located the upper north and typically concentrated in Muang districts. The rest were situated in the lower north and generally spread on the outer districts. As at the end of June 2004, bank credits and deposits amounted to Baht 291.8 billion and Baht 206.6 billion, accounting for 5.6 percent and 4.3 percent respectively of total credit outstanding and deposit outstanding of the country.

Foreign Trade

Foreign trade is categorized into two groups : (1) foreign trade with shipment by air, filing at Chiang Mai Airport Customs House and Northern Region Industrial Estate Customs House, Lamphun province, and (2) foreign trade with shipment by other means, filing at customs checkpoints, which is known as border trade. The first, accounting for more than 80.0 percent of total foreign trade value, involves trading of electronics components produced in the Northern Region Industrial Estate in Lamphun. Chiang Mai Airport Customs House be the export channel for agricultural product and handicraft. The second involves border trading with Myanmar, Lao PDR, and southern China. Currently, major exports consist of consumer goods, rubber tires, and construction materials where main imports comprise oxen, buffaloes, and wood products. Myanmar, the key-trading partner, captures over 60.0 percent of border trade value.

Economic growth in Northern Region.

Sector	1996	1997	1998	1999	2000	2001	2002
Agriculture	8.7%	-3.9%	2.4%	3.3%	5.5%	4.6%	0.5%
Non-Agriculture	6.7%	1.1%	-7.5%	0.0%	0.8%	-1.8%	9.9%
Total	7.1%	0.2%	-5.8%	0.6%	1.7%	-0.5%	7.9%

Source : NESDB.

Economic Structure in 2002.

Sector	Share
Agriculture	20.1%
Manufacturing	17.9%
Whole sale and Retail Trade	17.3%
Transport, Storage and Communications	7.0%
Real Estate and Renting	6.3%
Education	5.8%
Mining and Quarrying	5.4%
Public Administration and Defence	5.1%
Construction	3.8%
Hotels and Restaurants	2.1%
Others	9.4%
Total	100.0%

Source : NESDB.



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